

STATE OF CALIFORNIA  
ENVIRONMENTAL PROTECTION AGENCY  
DEPARTMENT OF TOXIC SUBSTANCES CONTROL

In the Matter of:	)	Docket No. DO 91/92 2-007
	)	
C & M Plating Works	)	ENFORCEMENT ORDER
598 Sixth Street	)	
San Francisco, CA 94103	)	
	)	
EPA I.D. No. CAD 009204736	)	
	)	
Respondent	)	Health and Safety Code
	)	Sections 25187

INTRODUCTION

1.1. Parties. The State Department of Toxic Substances Control (Department) issues this Enforcement Order (Order) to C & M Plating Works, a partnership owned by Raymond J. Mattman, Carl F. Mattman, Ronald M. MacDonald, and Robert W. Wolfe, doing business as C & M Plating Works (Respondent).

1.2. Site. Respondent generates and treats hazardous waste at the following site: 598 Sixth Street, San Francisco, CA 94103 (Site).

1.3. Permit/Interim Status. The Department authorized Respondent to store hazardous waste by permit issued on September 30, 1983. The permit was expired on September 30, 1988. The storage facility is currently undergoing closure. Respondent added several wastewater treatment units following issuance of the permit.

1.4. Jurisdiction. Section 25187 of the Health and Safety Code (H&SC) authorizes the Department to order corrective action

1 and assess a penalty when the Department determines that any  
2 person has violated, is violating, or threatens to violate  
3 specified provisions of the Health and Safety Code or any permit,  
4 rule, regulation, standard or requirement issued or adopted  
5 pursuant thereto.  
6

#### 7 DETERMINATION OF VIOLATIONS

8 2. The Department has determined:

9 2.1. On or about March 24, 1988 and September 21, 1989,  
10 Respondent violated Title 22, Cal. Code Regs., Section 67122  
11 [presently Section 66264.33] in that Respondent failed to test  
12 and maintain emergency equipment as necessary to assure its  
13 proper operation in time of emergency, to wit: Respondent failed  
14 to test and maintain the eye wash and safety shower located in  
15 building #2, and fire extinguisher located at the drum storage  
16 area.

17 2.2. On or about March 24, 1988, Respondent violated Title  
18 22, Cal. Code Regs., Sections 66508(a)(2)(3), and (c) [presently  
19 Section 66262.34(a)(2), and (f)(3)] by storing hazardous waste in  
20 a container with no label, to wit: Respondent failed to label a  
21 55-gallon drum located near the filter press machine.

22 2.3. On or about March 24, 1988, Respondent violated Health  
23 and Safety Code (HS&C), Section 25201, Title 22, Cal. Code Regs.,  
24 Section 66371(a) [presently Section 66270.1(c)] in that  
25 Respondent operated a hazardous waste treatment facility without  
26 a valid hazardous waste facility permit, to wit: Respondent

1 treated spent acid containing Chromium generated from the plating  
2 operation without a permit.

3  
4 2.4. On or about October 28, 1991, Respondent violated  
5 HS&C, Section 25201, Title 22, Cal. Code Regs., Section  
6 66270.1(c) in that Respondent operated a hazardous waste  
7 treatment facility without a valid hazardous waste facility  
8 permit, to wit: Respondent treated wastewater containing  
9 Chromium generated from the plating operation without a permit  
10 (Chromium Separation Unit).

11 2.5. On or about October 28, 1991, Respondent violated  
12 Title 22, Cal. Code Regs., Section 66264.52(d) in that the  
13 Contingency Plan did not include all necessary elements, to wit:  
14 Respondent failed to include home addresses of the emergency  
15 coordinators in the updated Contingency Plan.

16  
17 SCHEDULE FOR COMPLIANCE

18 3. Based on the foregoing DETERMINATION OF VIOLATIONS, IT  
19 IS HEREBY ORDERED THAT:

20 3.1.1. The Department has determined that no further  
21 actions are required for violations listed in paragraphs 2.1,  
22 2.2, and 2.3 based on the review of the June 14, 1988 submittals.

23 3.1.2. Within 30 days of the effective date of this Order,  
24 respondent shall submit a modification to the current closure  
25 plan describing closure of the Chromium separation unit.

1  
2 3.1.3. No further action is required for the violation  
3 listed in paragraph 2.5 based on the review of the January 13,  
4 1992 submittal.

5 3.2. Submittals. All submittals from a Respondent pursuant  
6 to this Order shall be sent to:

7 Charlene Williams  
8 Branch Chief  
9 Surveillance and Enforcement Branch  
10 Department of Toxic Substances Control  
11 700 Heinz Avenue, Suite 200  
12 Berkeley, California 94710

13 Walter Bahm  
14 Associate Waste Management Engineer  
15 Facility Permitting Branch  
16 Department of Toxic Substances Control  
17 700 Heinz Avenue, Suite 200  
18 Berkeley, California 94710

19 3.3. Communication. All approvals and decisions of the  
20 Department made regarding submittals and notification will be  
21 communicated to Respondent in writing by the Regional  
22 Surveillance and Enforcement Branch Chief, Department of Toxic  
23 Substances Control, or her/his designee. No informal advice,  
24 guidance, suggestions, or comments by the Department regarding  
25 reports, plans, specifications, schedules, or any other writings  
26 by Respondent shall be construed to relieve Respondent of the  
27 obligation to obtain such formal approvals as may be required.

3.4. Department Review and Approval. If the Department  
determines that any report, plan, schedule, or other document  
submitted for approval pursuant to this Order fails to comply

1 with the Order or fails to protect public health or safety or the  
2 environment, the Department may:

3 a. Modify the document as deemed necessary and approve  
4 the document as modified or

5 b. Return the document to Respondent with recommended  
6 changes and a date by which Respondent must submit to the  
7 Department a revised document incorporating the recommended  
8 changes.

9 3.5. Compliance with Applicable Laws: Respondent shall  
10 carry out this Order in compliance with all local, State, and  
11 federal requirements, including but not limited to requirements  
12 to obtain permits and to assure worker safety.

13 3.6. Endangerment during Implementation: In the event that  
14 the Department determines that any circumstances or activity  
15 (whether or not pursued in compliance with this Order) are  
16 creating an imminent or substantial endangerment to the health or  
17 welfare of people on the site or in the surrounding area or to  
18 the environment, the Department may order Respondent to stop  
19 further implementation of this Order for such period of time as  
20 needed to abate the endangerment. Any deadline in this Order  
21 directly affected by a Stop Work Order under this Section shall  
22 be extended for the term of the Stop Work Order.

23 3.7. Liability: Nothing in this Order shall constitute or  
24 be construed as a satisfaction or release from liability for any  
25 conditions or claims arising as a result of past, current, or  
26

1 future operation of Respondent. Notwithstanding compliance with  
2 the terms of this Order, Respondent may be required to take  
3 further actions as are necessary to protect public health or  
4 welfare or the environment.

5  
6 3.8. Site Access: Access to the site shall be provided at  
7 all reasonable times to employees, contractors, and consultants  
8 of the Department, and any agency having jurisdiction. Nothing  
9 in this Order is intended to limit in any way the right of entry  
10 or inspection that any agency may otherwise have by operation of  
11 any law. The Department and its authorized representatives shall  
12 have the authority to enter and move freely about all property at  
13 the site at all reasonable times for purposes including but not  
14 limited to: inspecting records, operating logs, and contracts  
15 relating to the Site; reviewing the progress of Respondent in  
16 carrying out the terms of this Order; and conducting such tests  
17 as the Department may deem necessary. Respondent shall permit  
18 such persons to inspect and copy all records, documents, and  
19 other writings, including all sampling and monitoring data, in  
20 any way pertaining to work undertaken pursuant to this Order.

21 3.9. Sampling, Data, and Document Availability: Respondent  
22 shall permit the Department and its authorized representatives to  
23 inspect and copy all sampling, testing, monitoring, and other  
24 data generated by Respondent or on Respondent's behalf in any way  
25 pertaining to work undertaken pursuant to this Order. Respondent  
26 shall allow the Department and its authorized representatives to

1 take duplicates of any samples collected by Respondent pursuant  
2 to this Order. Respondent shall maintain a central depository of  
3 the data, reports, and other documents prepared pursuant to this  
4 Order. All such data, reports, and other documents shall be  
5 preserved by Respondent for a minimum of six years after the  
6 conclusion of all activities under this Order. If the Department  
7 requests that some or all of these documents be preserved for a  
8 longer period of time, Respondent shall either comply with that  
9 request, deliver the documents to the Department, or permit the  
10 Department to copy the documents prior to destruction.  
11 Respondent shall notify the Department in writing at least six  
12 months prior to destroying any documents prepared pursuant to  
13 this Order.

14       3.10. Governmental Liabilities: The State of California  
15 shall not be liable for injuries or damages to persons or  
16 property resulting from acts or omissions by Respondent or  
17 related parties specified in paragraph 3.16 in carrying out  
18 activities pursuant to this Order, nor shall the State of  
19 California be held as a party to any contract entered into by  
20 Respondent or its agents in carrying out activities pursuant to  
21 the Order.

22       3.11. Additional Enforcement Actions: By issuance of this  
23 Order, the Department does not waive the right to take further  
24 enforcement actions.  
25  
26  
27

1  
2 3.12. Incorporation of Plans and Reports. All plans,  
3 schedules, and reports that require Departmental approval and are  
4 submitted by Respondent pursuant to this Order are incorporated  
5 in this Order upon approval by the Department.

6 3.13. Extension Request: If Respondent is unable to  
7 perform any activity or submit any document within the time  
8 required under this Order, the Respondent may, prior to  
9 expiration of the time, request an extension of time in writing.  
10 The extension request shall include a justification for the  
11 delay.

12 3.14. Extension Approvals: If the Department determines  
13 that good cause exists for an extension, it will grant the  
14 request and specify in writing a new compliance schedule.

15 3.15. Penalties for Noncompliance: Failure to comply with  
16 the terms of this Order may also subject Respondent to costs,  
17 penalties, and/or punitive damages for any costs incurred by the  
18 Department or other government agencies as a result of such  
19 failure, as provided by H&SC, Section 25188 and other applicable  
20 provision of law.

21 3.16. Parties Bound: This Order shall apply to and be  
22 binding upon Respondent, and its officers, directors, agents,  
23 employees, contractors, consultants, receivers, trustees,  
24 successors, and assignees, including but not limited to  
25 individuals, partners, and subsidiary and parent corporations,  
26 and upon any successor agency of the State of California that may



1 have responsibility for and jurisdiction over the subject matter  
2 of this Order.

3  
4 PENALTY

5 4. Based on the foregoing DETERMINATION OF VIOLATIONS, THE  
6 Department sets the amount of Respondent's total proposed penalty  
7 at \$ 3,000.

8 RIGHT TO A HEARING

9 5. You may request a hearing to challenge the Order.  
10 Appeal procedures are described in the attached Statement to  
11 Respondent.

12 EFFECTIVE DATE

13 6. This Order is final and effective fifteen days from the  
14 date it is served on you, unless you request a hearing within the  
15 fifteen-day period.

16 TIME PERIODS

17 7. "Days" for purposes of this Order and Complaint means  
18 calendar days.

19 Date of Issuance: February 18, 1992

20  
21 

22 Wei Wei Chui, Unit Chief  
23 Surveillance and Enforcement Branch  
24 Department of Toxic Substances Control

25 cc: See next page  
26  
27

1  
2 cc: Mr. Val Siebal  
3 Regional Administrator  
4 Region 1  
5 Department of Toxic Substances Control  
6 10151 Croydon Way  
7 Sacramento, California 95827  
8  
9 Mr. Dennis Dickerson  
10 Regional Administrator  
11 Region 3  
12 Department of Toxic Substances Control  
13 1405 North San Fernando Boulevard  
14 Burbank, California 91504  
15  
16 Mr. John Hinton  
17 Regional Administrator  
18 Region 4  
19 Department of Toxic Substances Control  
20 245 West Broadway, Suite 350  
21 Long Beach, California 90802  
22  
23 Mr. Mike Shepard, Esq.  
24 Toxic Legal Office  
25 Department of Toxic Substances Control  
26 P.O. Box 806  
27 Sacramento, California 95812-0806  
28  
29 Mr. Larry Matz  
30 Enforcement Coordinator  
31 Surveillance and Enforcement  
32 Department of Toxic Substances Control  
33 P.O. Box 806  
34 Sacramento, California 95812-0806  
35  
36 ✓ Ms. Lily Wong  
37 Waste Management Branch  
38 U.S. Environmental Protection Agency  
39 Region IX  
40 75 Hawthorne Street, H-4-1  
41 San Francisco, California 94105  
42  
43 Mr. Kevin James, Esq.  
44 Office of the Attorney General  
45 Department of Justice  
46 2101 Webster Street, 12th Floor  
47 Oakland, California 94612-3049

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**DEPARTMENT OF TOXIC SUBSTANCES CONTROL**700 HEINZ AVENUE, SUITE 200  
BERKELEY, CALIFORNIA 94710

December 9, 1991

**CERTIFIED MAIL**Mr. Ray Mattman  
C & M Plating Works  
598 Sixth Street  
San Francisco, California 94103

EPA I.D. No. CAD 009 204 736

Dear Mr. Mattman:

**REPORT OF VIOLATION**

On October 28 and November 26, 1991, Department of Toxic Substances Control (DTSC) conducted inspections of C & M Plating Works (C & M). As a result of those inspections, the following violations of hazardous waste statutes and regulations were found.

**Violations**

1. Title 22, California Code of Regulations (Cal. Code Regs.), Section 66270.1 (c). Treatment without a permit.

C & M violated Title 22, Cal. Code Regs., Section 66270.1 (c), in that on or about October 28, 1991, C & M treated hazardous waste (F006) without a permit.

C & M employed a 55-gallon plastic tank which served as a treatment tank to separate Chromium and other metal-containing sludges from the treated rinsewater. C & M also used four filter bags to dewater the sludge (F006). This treatment, however, could be permitted through Permit-By-Rule regulations.

2. Title 22, Cal. Code Regs., Section 66264.52 (d). Contingency Plan.

C & M violated Title 22, Cal. Code Regs., Section 66264.52 (d), in that on or about October 28, 1991, C & M failed to include home addresses of the emergency coordinators in their updated contingency plan.

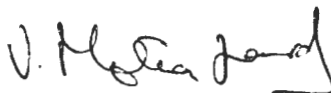
Mr. Ray Mattman  
December 9, 1991  
Page Two

Upon receipt of this report, C & M must correct the deficiencies noted in this report and submit to the Department written and/or photographic documentation that the above violations have been corrected. The Department may schedule a re-inspection of C & M to verify compliance.

The issuance of this Report of Violation does not preclude DTSC from taking administrative, civil, or criminal action as a result of the violations noted herein.

If you have any questions regarding this report, please contact Vajie Motiafard at (510) 540-3888.

Sincerely,



Vajie Motiafard  
Associate Hazardous Materials  
Specialist  
Surveillance & Enforcement Branch  
Region 2



Wei Wei Chui  
Unit Chief  
Surveillance & Enforcement Branch  
Region 2

Cert. Mail No. P 106 353 638

cc: Mr. Michael Shepard, Esq.  
Toxics Legal Office  
California-EPA  
Department of Toxics Substances Control  
P.O. Box 806  
Sacramento, California 95812-0806

Ms. Mary Locke, Chief  
Office of Local Enforcement  
California-EPA  
Department of Toxic Substances Control  
P.O. Box 806  
Sacramento, California 95812-0806

Mr. Ray Mattman  
December 9, 1991  
Page Three

Mr. Larry Matz  
Surveillance and Enforcement Branch  
California-EPA  
Department of Toxic Substances Control  
P.O. Box 806  
Sacramento, California 95812-0806

Ms. Lily Wong  
Waste Management Branch  
U. S. Environmental Protection Agency  
Region IX  
75 Hawthorne Street, H-4-1  
San Francisco, California 94105

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DEPARTMENT OF HEALTH SERVICES  
TOXIC SUBSTANCES CONTROL DIVISION  
2151 BERKELEY WAY, ANNEX 9  
BERKELEY, CA 94704  
(415) 540-3729



March 6, 1990

## CERTIFIED MAIL

Mr. Ray Mattman, Partner  
C&M Plating Works  
598 Sixth Street  
San Francisco, CA 94103

Dear Mr. Mattman:

RETURN TO COMPLIANCE  
EPA ID # CAD009204736

Your responses, dated January 5, 1990 and January 24, 1990, to our Report of Violation and Schedule for Compliance (ROV), dated December 28, 1989, were received by us on January 9, 1990 and January 29, 1990.

Based on our review of those responses, the Department has determined that C&M Plating Works, San Francisco, CA, has completed the required corrections as outlined in the ROV.

The issuance of this letter does not preclude the Department from taking administrative, civil or criminal action as a result of the violations noted in the ROV, dated December 28, 1989, or any other violations noted previously.

Thank you for your efforts to achieve compliance. If you have any questions regarding this letter, please contact Bill Brown at (415) 540-3889.

Sincerely,

William L. Brown  
Hazardous Materials Specialist  
Region 2  
Toxic Substances Control Program

Charlene F. Williams, Chief  
Surveillance and Enforcement Unit  
Region 2  
Toxic Substances Control Program



Mr. Ray Mattman  
Page 2  
March 6, 1990

Cert. Mail No. P 105 530 302

cc: Lily Wong  
U.S. EPA, Region IX  
215 Fremont Street  
San Francisco, CA 94105

William F. Soo Hoo  
Toxics Legal Office  
Toxic Substances Control Program  
714/744 P Street  
P.O. Box 942732  
Sacramento, CA 94234-7320

Mary Locke  
Office of Local Enforcement  
Toxic Substances Control Program  
714/744 P Street  
P.O. Box 942732  
Sacramento, CA 94234-7320

Larry Matz  
Surveillance and Enforcement  
Toxic Substances Control Program  
714/744 P Street  
P.O. Box 942732  
Sacramento, CA 94234-7320

Lucille Van Ommering  
Financial Responsibility Unit  
Toxic Substances Control Program  
714/744 P Street  
P.O. Box 942732  
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DEPARTMENT OF HEALTH SERVICES  
TOXIC SUBSTANCES CONTROL PROGRAM  
2151 BERKELEY WAY, ANNEX 7  
BERKELEY, CA 94704

INSPECTION REPORT

0661 11 NAF

C&M PLATING WORKS  
598 SIXTH STREET  
SAN FRANCISCO, CA 94103

EPA ID # CAD009204736 3B

Inspected by: William Brown

Date of Inspection: September 21, 1989

Date of Report: December 20, 1989

I. Purpose

RCRA, Non-major, Permitted TSD facility, Land-ban Generator inspection.

II. Representatives Present

## C&amp;M Plating Works:

Ray Mattman, Partner  
Carl Mattman, Partner

## City &amp; County of San Francisco:

Steve Low, Environmental Health Inspector

## DHS/TSCP:

William Brown, Hazardous Materials Specialist

III. Owner/Operator

Ray Mattman, Partner  
Carl Mattman, Partner  
Ron McDonald, Partner  
Robert Wolfe, Partner

The person directly responsible for hazardous waste management at the facility is Ray Mattman.

IV. Background

The California Department of Health Services (Department) issued a Hazardous Waste Facility Permit to C&M Plating Works on September 30, 1983, which expired on September 30, 1988. The Permit authorized the facility to store plating shop wastes in tanks and containers. The storage capacity listed in the Permit was for seven 55-gallon drums, one 470-gallon tank and four 1,300-gallon tanks.

C&M Plating stopped using four of their hazardous waste storage tanks in 1985, and the fifth tank in 1987, after they had been chemically cleaned and repaired.

Consultants for C&M Plating sent a letter to the Department, dated September 23, 1987, requesting a change in status from a hazardous waste storage facility to a hazardous waste generator.

An inspection of this facility was conducted by the Department on April 1, 1986. No violations were observed, but it was noted that the facility's treatment systems were not addressed in the Permit and that a variance should be applied for. A variance application was submitted on April 10, 1986, for the cyanide destruction, chrome separation, and pH adjustment pretreatment processes, and a modified variance application, dated October 13, 1987, was submitted to the Department for a new pretreatment system for the chrome containing spent acid treatment process waste. The variance request was denied by the Department in a letter dated February 10, 1989 (Attachment #7). Discussions regarding submittal of another revised variance application are being conducted with the Department's Permitting Unit.

Another inspection of this facility by the Department was conducted on March 24, 1988, and seven violations of hazardous waste statutes and regulations were found. A Class I Report of Violation (ROV), dated May 23, 1988, was issued by the Department to C&M Plating Works. The violations included treatment of hazardous waste without a permit, failure to notify the Department prior to closure of the storage tanks, not affixing a hazardous waste label to a drum of hazardous waste, not maintaining an eyewash in proper operating condition, not maintaining complete training documentation, not including all required information in the Contingency Plan, and not including all required information on manifests. The case has been referred to the Attorney General's office for enforcement.

According to Mr. Bruce Seale, with the City and County of San Francisco, Department of Public Works, Industrial Waste Division, an order (# 105015) was issued (in May, 1976) to C&M Plating Works, which allows discharge to the sewer, with limitations, of their treated waste water. The San Francisco Department of Public Health issued a permit to C&M Plating Works on January 8, 1988, for hazardous materials storage.

V. General Description of Facility

The facility is a small metal plating and polishing shop located on the corner of Sixth and Brannan Streets in San Francisco, CA. It consists of two buildings, a drum and

tank storage area, and a small parking lot (see map, Attachment 1).

Wastes are stored in drums, but they are no longer stored in tanks (the tanks are undergoing closure through the Department). Wastewaters are being treated prior to discharge to the local publicly owned treatment works (POTW) in accordance with discharge requirements.

## VI. Hazardous Waste Activity Description

### Treatment Units

In the past, up to five treatment processes have been used at the facility to treat plating bath solutions and/or rinse waters. These treatment processes were: a chrome containing spent acid treatment process, a chrome separation process, a cyanide destruction process, a pH adjustment process, and a filter press. Mr. Mattman assigned Waste Water Treatment System (WWTS) numbers to the processes and for clarity we will use the same designations in this report. WWTS #1 is the non-chrome containing spent acids rinse waters (pH adjustment) treatment system, WWTS #2 is the cyanide destruction (oxidation) treatment unit, WWTS #3 is the chrome separation treatment process, WWTS #4 is the final neutralization treatment process (which does not treat hazardous waste), and WWTS #5 is the chrome containing spent acid treatment process (which includes the filter press) (see Attachment #9 for a diagram of the treatment systems). According to Ray Mattman, the facility stopped using two of the processes and a portion of a third process after receiving a letter from the Department, dated February 10, 1989, which denied a variance request that the facility had submitted for its treatment processes. The two processes that were stopped entirely were the chrome containing spent acid treatment process and the filter press (WWTS #5). The process that was partially discontinued was the cyanide destruction process (WWTS #2). Mr. Mattman stated that they are no longer treating the concentrated cyanide plating bath solutions, but they are still treating rinse waters containing cyanide. These rinse waters were found to be non-hazardous according to analytical results of samples taken by the Department on July 21, 1988. The facility is also proposing to treat waste alkaline cleaners (that are used to clean metal parts and that have a pH of around 13), by adding sulfuric acid to lower the pH.

### Drum Storage Area

Drummed hazardous waste acid is stored in the facility's drum storage area, on a raised platform. The drummed hazardous waste cyanide was being accumulated inside Building #2. Mr. Mattman said that the two wastestreams

would not be stored near each other until a berm or other physical barrier could be erected to keep the wastes from comingling in the event of an accidental release.

#### Storage Tanks

Prior to March, 1987, the facility was storing acid wastes in the permitted storage tanks. Mr. Mattman said that usage of tanks 1,3,4 & 5 stopped in October, 1985, and use of tank 2 stopped in March, 1987. He said that the tanks were chemically cleaned on these dates, using a solution of 2% or less liquid caustic soda and water to neutralize any acid remaining on the liners. He said that the liners were also wiped and triple rinsed. He said that they had cleaned the tanks in preparation for performing repairs on the tanks. The tanks are currently undergoing closure proceedings through the Department.

#### VII. Violations

1. Title 22, California Code of Regulations (Cal. Code Regs.), Sections 66508 (a)(4), 67121 (c).

The hazardous waste drum storage area, used to store waste acids, did not have adequate decontamination equipment. Specifically, the drum storage area, located outside the northwest wall of Building #2, did not have an adequate eyewash/safety shower (Attachment #2, Photo #3).

2. Title 22, Cal. Code Regs., Sections 66508 (a)(4), 67122.

All fire protection equipment was not maintained as necessary to assure its proper operation in time of emergency. Specifically, the facility's fire extinguisher, located at the hazardous waste drum storage area, needed to be recharged.

#### Potential Land Ban Violation

3. Title 40, Code of Federal Regulations (CFR) 268.7 (a)(6).

The facility did not retain on-site copies of the land disposal restrictions notifications and certifications sent with restricted wastes that have been shipped off-site. Specifically, C&M Plating Works did not retain copies of certifications for waste restricted from land disposal such as the waste listed on manifest number 88119040 (Attachment #5).

#### VIII. Observations

Upon arrival at the facility (at 9:30 am), I met with Ray Mattman and Carl Mattman (both with C&M Plating) and Steve Low (with the City and County of San Francisco), and explained the purpose of my visit.

Ray Mattman, Steve Low, and I began the site tour by looking at the hazardous waste drum storage area located next to the former hazardous waste storage tanks outside the northwest wall of Building #2. I observed two 55 gallon capacity plastic drums labeled as containing waste acids (15-20% hydrochloric acid with dissolved metals and 5% sulfuric acid with 2% hydrofluoric acid) and eight empty product drums (Attachment #2, Photos #1 & 2). I observed that the fire extinguisher located in this area needed recharging. I also observed that a water hose was the only decontamination equipment available at this location (Attachment #2, Photo #3). I also looked at the former hazardous waste storage tanks and observed where sampling had been performed as part of the closure process (Attachment #2, Photos #4-6).

We then went back inside Building #2 and viewed three drums containing cyanide wastes. One drum was a 55 gallon capacity metal drum containing sludge and absorbent from the zinc plating process. Another drum was a 55 gallon capacity metal drum containing filter material contaminated with cyanide from the plating processes. The third drum was a 55 gallon capacity plastic drum containing liquid stripping solution with 2.2% cyanide (Attachment #2, Photos #7 & 8).

We then inspected the filter press (part of WWTS #5) and the mixed acid treatment tank (part of WWTS #2), both of which were not in use (Ray Mattman said that he stopped using them when the variance was denied, see Attachment #2, Photo #9).

Next we looked at the cyanide treatment unit (WWTS #2) which is still used to treat plating rinse waters containing cyanide, in order to meet city discharge requirements (Attachment #2, Photos #10 & 11). This unit is not now treating hazardous waste.

We then proceeded to the chrome treatment unit (WWTS #3), which is still in use (Attachment #2, Photo #12).

We then went to the final pH adjustment unit (WWTS #4) and noted that it was in use (Attachment #2, Photos #13 & 14). This unit does not treat hazardous waste.

Next we looked at the new, and as yet unused alkaline cleaner pH adjustment treatment unit. Ray Mattman was using water, colored with blue dye, to test the unit and I advised him not to use the unit for treating waste cleaner (which he said has a pH greater than 12.5) until he received a

variance or permit from the Department to operate it (Attachment #2, Photos #15-19).

We then went to the lab/office and I reviewed the documents as noted on the checklist. I asked Ray Mattman for copies of the land disposal restriction (LDR) notifications that he said he had sent with each shipment of waste, and he showed me completed examples (but without manifest numbers) of what the notification would say for each particular wastestream, which he uses for guidance, but he did not have copies of the actual notifications that he sent. I requested (and received) a copy of a manifest (#88119040, Attachment #5) listing LDR waste and I later verified that the required notifications had been sent (by requesting, and receiving, copies of the notifications from the receiving facility, Solvent Services, Inc., see copies, Attachment #6).

We then walked to the front office, where Carl Mattman was located and I finished reviewing documents and records. I did not observe any other violations associated with the records.

IX. Discussion with Management

I discussed the violations I observed with Ray Mattman and told him that I would be sending him a letter listing the violations. I also told him that the U.S. Environmental Protection Agency (EPA) would be enforcing the LDR requirements. He said that he would do whatever was necessary to comply with the laws and regulations.

X. Attachments

1. Facility map - 1pg.
2. Photographs - 6pgs.
3. Generator checklist - 20pgs.
4. Land-ban checklist - 7pgs.
5. Copy of manifest #88119040 - 2pgs.
6. Copies of land-ban notifications - 4pgs.
7. Variance denial letter - 3pgs.
8. Financial review form - 1pg.
9. Treatment systems diagram - 1pg.



William L. Brown

William L. Brown  
Hazardous Materials Specialist

11/4/89  
Date Submitted

James Scott Bullock for Charlene F. Williams

Charlene F. Williams  
Senior Hazardous Materials  
Specialist

12/20/89  
Approval Date

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DEPARTMENT OF HEALTH SERVICES  
TOXIC SUBSTANCES CONTROL PROGRAM  
2151 BERKELEY WAY, ANNEX 7  
BERKELEY, CA 94704



## LAND BAN GENERATOR INSPECTION REPORT

EPA ID#: CAD009204736

Facility Name: C&amp;M Plating Works

Facility Location: 598 Sixth Street  
San Francisco, CA 94103

Inspected By: William Brown

Date of Inspection: September 21, 1989

Background: This inspection was conducted as part of the Department's RCRA grant workplan commitment, and was intended to assess the facility's compliance with the federal requirements contained in 40 CFR Part 268.

## Persons Present:

## C&amp;M Plating Works:

Ray Mattman, Partner  
Carl Mattman, Partner

## City &amp; County of San Francisco:

Steve Low, Environmental Health Inspector

## DHS/TSCP:

William Brown, Hazardous Materials Specialist

Sr. HMS/Sr. WME James Scott Bullard for Date of Report 12/20/89  
Charlene F. Williams

Land Disposal Restrictions  
(Part 268)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Did the facility handle any waste restricted from land disposal* since its effective prohibition date: 268.1(b) (See attached listings)			
F001 thru F005 spent solvents?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	F003 (Stoddard Solv.)
F020-23 and F026-28 Dioxins?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
"California List" wastes?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	723, 726, 792, 711
First Third scheduled wastes?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	F006 - W.W. treatment sludge

Exemptions: Are the prohibited wastes exempted from land disposal restrictions because:

The waste is from conditionally-exempt small quantity generators? 268.1(c)(3)(all)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
A farmer is disposing of waste pesticides in accordance with 262.70? 268.1(c)(4)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
An "imminent endangerment" waiver has been granted under 121(d)(4) of CERCLA? 268.1(d)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

If no restricted wastes were handled after the effective dates or an above exemption applies to all restricted wastes handled, do not complete remainder of this section.

Exceptions: Can the restricted wastes continue to be land disposed because:

A case-by case extension has been granted under Subpart C or 268.5, for the wastes handled? 268.1(c)(1)(all), 268.30(d)(3)(F001-5), 268.31(d)(3)(dioxins), 268.32(g)(2)(CA list), 268.33(e)(3)(1st 3rd)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
A no-migration petition has been granted under 268.6, for the wastes and units involved? (See 40 CFR 268.6(e-f) for operating requirements.) 268.1(c)(2)(all), 268.30(d)(2)(F001-5), 268.31(d)(2)(dioxins), 268.32(g)(1)(CA list), 268.33(e)(2)(1st 3rd)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
An exemption has been granted because the waste is certified treated by the best demonstrated available technology (BDAT)? 268.44(a)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

\* Land disposal means placement in or on the land, including a landfill, surface impoundment, waste pile, land treatment facility, salt dome formation, underground mine or cave, injection well, or placement in a concrete vault or bunker for disposal. 268.2(a) Injection wells are being covered under a separate schedule.

Land Disposal Restrictions - Continued  
(Part 268)

Yes    No    Comments

A generator certifies a good-faith effort in compliance with 268.8 "soft-hammer" regulations? 268.1(c)(5)

✓    \_\_\_\_\_

If any of the preceding exceptions apply, the attached effective 268 Subpart C dates and concentrations, Subpart D standards, and Subpart E storage restrictions do not apply. Waste analysis and applicable generator certification requirements still pertain.

Has the handler not merely diluted the restricted waste or treatment residue in order to achieve compliance? 268.3

✓    \_\_\_\_\_

Storage:

Are restricted wastes only being stored where: 268.50-

(a)(1) A generator is using tanks or containers while accumulating a sufficiently large batch to properly recover, treat, or dispose?

✓    \_\_\_\_\_

(a)(2) A TSD is accumulating a batch as above? and:

(i) Each container is marked with the contents and accumulation start date?

✓    \_\_\_\_\_

(ii) Each tank is marked with the contents, accumulation start date, quantity of H.W., and/or the information is in the operating record?

✓    \_\_\_\_\_

(c) The TSD can prove that any storage over one year was solely for the purpose of necessary accumulation? or:

\_\_\_\_\_    N/A    \_\_\_\_\_

(d) The wastes are subject to an approved no-migration petition, case-by-case extension, a nation-wide variance, or a valid "soft hammer" 268.8 certification?

\_\_\_\_\_    N/A    \_\_\_\_\_

(e) The stored wastes already meet any applicable treatment, concentration, or waiver standards?

\_\_\_\_\_    N/A    \_\_\_\_\_

(f) After 7/8/87, are liquid hazardous wastes over 50 ppm PCBs stored for less than a year, and in a 761.65(b) (TSCA) complying storage area?

\_\_\_\_\_    N/A    \_\_\_\_\_

See p. 268: 8 for off-site storage facility recordkeeping requirements.

Land Disposal Restrictions - Continued  
(Part 268)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
<u>Generators: Waste Analysis</u>			
If restricted wastes are generated on-site, has the generator, using knowledge or analysis, determined if the waste is restricted from land disposal? 268.7(a)	✓	—	_____
Was the Paint Filter Liquids Test used to determine if waste sludges and solids were CA list liquids? 268.32(i)	—	—	N/A (Knowledge)
Did the generator determine if liquid CA list wastes have a pH of less than or equal to 2? 268.32(j)(1)	✓	—	_____
Did the generator determine if liquid CA list wastes containing PCBs or HOCs were prohibited? 268.32(j)(2)	—	—	N/A
Where waste treatment standards are expressed as concentrations in the waste extract (268.41), did any analysis include the TCLP (268 Appendix I)? 268.33(g)	—	—	N/A
<u>Notices, Certifications, and Demonstrations:</u>			
If determined that the waste is <u>restricted and requires treatment</u> before land disposal, have they notified the treatment or storage facility with each shipment of waste? including: 268.7(a)(1)-	✓	—	_____
(i) EPA H.W. number? - ...	✓	—	_____
(ii) Appropriate treatment standards and prohibitions?	✓	—	_____
(iii) Manifest # for the waste?	✓	—	_____
(iv) Available waste analysis data?	✓	—	_____
If the waste is determined to be <u>restricted but not require further treatment</u> , has the generator submitted with each shipment to the treatment, storage or land disposal facility, a notice and a certification that the waste meets both treatment standards and applicable prohibitions? 268.7(a)(2)	—	—	N/A
Did the notification include: 268.7(a)(2)(i)-			
(A) EPA H.W. number?	—	—	_____
(B) Appropriate treatment standards and prohibitions?	—	—	_____
(C) Manifest # for the waste?	—	—	_____
(D) Available waste analysis data?	—	—	_____

Land Disposal Restrictions - Continued  
(Part 268)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Was the following certification signed: 268.7(a)(2)(ii)	<u>      </u>	<u>      </u>	<u>N/A</u>

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d). I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

If the generator's waste is subject to a national variance, an extension or an exemption, have they notified the receiving facility with each shipment of waste that the waste is not prohibited from land disposal? 268.7(a)(3)

<u>      </u>	<u>      </u>	<u>N/A</u>
---------------	---------------	------------

Did the notice include: 268.7(a)(3)-

- (i) EPA H.W. number?
- (ii) Appropriate treatment standards and prohibitions?
- (iii) Manifest # for the waste?
- (iv) Available waste analysis data?
- (v) The date the waste is subject to prohibitions?

<u>      </u>	<u>      </u>	<u>      </u>
<u>      </u>	<u>      </u>	<u>      </u>
<u>      </u>	<u>      </u>	<u>      </u>
<u>      </u>	<u>      </u>	<u>      </u>
<u>      </u>	<u>      </u>	<u>      </u>

If determined that the waste is a First Third waste without treatment standards and not a CA list waste (and thus a "soft hammer" waste), have they notified the receiving facility with each shipment? including: 268.7(a)(4)-

<u>      </u>	<u>      </u>	<u>N/A</u>
---------------	---------------	------------

- (i) EPA H.W. number?
- (ii) Appropriate certifications and the restrictions under 268.33(f) for "soft hammer" wastes?
- (iii) Manifest # for the waste?
- (iv) Available waste analysis data?

<u>      </u>	<u>      </u>	<u>      </u>
<u>      </u>	<u>      </u>	<u>      </u>
<u>      </u>	<u>      </u>	<u>      </u>
<u>      </u>	<u>      </u>	<u>      </u>

If determined that the waste is restricted based solely on knowledge, is all supporting data used in the determination maintained on-site in the generator's files?  
268.7(a)(5)

<u>✓</u>	<u>      </u>	<u>      </u>
----------	---------------	---------------

Has the generator retained on-site a copy of all notices, certifications, waste analysis data, and other Part 268 records for at least five years? 268.7(a)(6)

<u>      </u>	<u>✓</u>	<u>They have not retained copies of notes</u>
---------------	----------	---

NOTE: If the recipient of the generator's waste is not on the attached list (p. 11) of known land ban facilities, or if an off-site shipment without notification has occurred, indicate the accepting TSD facility on p. 11 for proper follow-up.

Land Disposal Restrictions - Continued  
(Part 268)

Yes    No    Comments

Generators of First Third "soft hammer" wastes (268.33(f)) shipped for land disposal:

Prior to shipment for land disposal, has the generator certified and submitted to the R.A. a demonstration of a good faith effort to locate and contract with treatment and recovery facilities for the practically available treatment which provides the greatest environmental benefit?

268.8(a)(1-2)

—    —    N/A

Did the demonstration include a list of facilities and representatives contacted, complete with addresses, phone numbers, and contact dates? 268.8(a)(2)

—    —    |

Was a copy of the demonstration submitted to the receiving facility with the first shipment of waste, and the certification with each shipment of waste?

268.8(a)(3) or -(4)

—    —    |

Are copies of the demonstration and certification kept on site for at least five years? 268.8(a)(3) or -(4)

—    —    |

If the generator determined there is no practical treatment for his waste, did the demonstration include a written discussion and the following certification?

268.8(a)(2)(i)

—    —    N/A

I certify under penalty of law that the requirements of 40 CFR 268.8(a)(1) have been met and that disposal in a landfill or surface impoundment is the only practical alternative to treatment currently available. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.

If the generator determines that there are practical treatments for the waste, did they contract to use the technology that they demonstrated yields the greatest environmental benefits? 268.8(a)(2)(ii)

✓    —    —

Did they include the following certification? 268.8(a)(2)(ii)

✓    —    —

I certify under penalty of law that the requirements of 40 CFR 268.8(a)(1) have been met and that I have contracted to treat my waste (or will otherwise provide treatment) by the practically available technology that yields the greatest environmental benefit, as indicated in my demonstration. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.



Land Disposal Restrictions - Continued  
(Part 268)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Has the generator immediately notified the R.A. of any changes in the conditions on which the certification was based? 268.8(b)(1)	_____	_____	<u>N/A</u>
If the R.A. invalidated a certification, has the generator immediately ceased shipments of the wastes, informed all facilities that received the waste, and retain records of the communication on-site in their files? 268.8(b)(3)	_____	_____	<u>N/A</u>

Land Disposal Restrictions - Continued  
(Part 268)

Yes    No    Comments

Treatment Facilities:    Waste Analysis

Has the facility tested their wastes as specified in their waste analysis plan (265.13)? 268.7(b)

N/A

Where treatment standards are expressed as concentrations in the waste extract (268.41), has the facility tested the treatment residues or extract (using the TCLP, 268 Appendix I) to assure they met the applicable treatment standards? 268.7(b)(1)

For CA list-only wastes, were the applicable 268.32 Paint Filter Liquids Test, pH test, HOCs, and PCB tests performed? 268.7(b)(2)

For wastes with treatment standards expressed as concentrations in the waste (268.43), was the treatment residue, not an extract, tested? 268.7(b)(3)

Notifications and certifications:

Has the treater submitted with each shipment to the land disposal facility, a notice including: 268.7(b)(4)

- (i) EPA H.W. number?
- (ii) Corresponding treatment standard?
- (iii) Manifest # for the waste?
- (iv) Available waste analysis data?

Has the treatment facility submitted a signed certification with each shipment of waste or treatment residue to the land disposal facility stating that the treatment standards in 268 Subpart D were met? 268.7(b)(5)

For wastes with treatment standards listed as concentrations (268.41 or -.43) did the certification read: 268.7(b)(5)(i)

I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operations of the treatment process used to support this certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to achieve the performance levels specified in 40 CFR Part 268 Subpart D without dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.

Land Disposal Restrictions - Continued  
(Part 268)

Yes   No   Comments

For wastes with treatment standards listed  
as technologies (268.42) did the  
certification read: 268.7(b)(5)(ii)

—   —   N/A

I certify under penalty of law that waste has been treated in accordance with the requirements of 40 CFR 268.42. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.

Treatment and Off-site Storage facilities:

Where waste or treatment residues are sent  
off-site for further management, did the  
sender comply with the notification and  
certification requirements as the  
generator of the waste? 268.7(b)(6-7)

—   —   N/A

Where First Third "soft hammer" wastes are  
treated or stored, has a copy of the  
generator's valid certification and  
demonstration been retained? 268.8(c)  
and:

—   —   —

Has the treater or storer forwarded copies  
of the generator's certification and  
demonstration (if applicable) to the  
facility receiving the waste or treatment  
residues? 268.8(c)(2)  
and:

—   —   —

Has the treatment or recovery facility  
certified as follows with each shipment  
of waste that he has treated the waste in  
accordance with the generator's  
demonstration? 268.8(c)(1)

—   —   —

I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operations of the treatment process used to support this certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with treatment as specified in the generator's demonstration. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.

Land Disposal Restrictions - Continued  
(Part 268)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Treatment in surface impoundments exemption:			
If wastes otherwise prohibited from land disposal are treated in surface impoundments, has the facility met the following conditions: 268.4(a)			
(1) Treated, not just stored, the wastes in the impoundment?	—	—	N/A
(2)(i) Analyzed all treatment residues (sludge and supernatant separately) to determine if they meet treatment and/or prohibition standards?	—	—	
(2)(ii) Removed annually all treatment residues (including liquids) that do not meet treatment or prohibition standards?*	—	—	
(2)(iii) Not placed the residues in another impoundment for subsequent management?*	—	—	
Has the facility certified that all impoundments used to treat restricted wastes meet design requirements (265.221(a)) and that the facility is in compliance with GW monitoring (265 Subpart F) requirements? 268.4(a)(3-4)	—	—	
Is there a principal means of treatment other than evaporation of H.W. constituents? 268.4(b)	—	—	
Does the waste analysis plan include the procedures and schedule for: 268.4(a)(2)(iv); 265.13(b)(7)-			
(i) Sampling the impoundment contents?	—	—	
(ii) The analysis of test data?	—	—	
(iii) The annual removal of residues which exhibit a H.W. characteristic, and:			
(A) Fail 268 Subpart D treatment standards? or:	—	—	
(B) Where no treatment standards have been established, such residues are prohibited from land disposal under:			
(1) 268.32 (CA list) or RCRA 3004(d)?	—	—	
(2) 268.33(f) (1st 3rd)?	—	—	✓

\* Unless the wastes have a valid "good faith" certification under 268.8. If the annual flow through the impoundments is greater than the combined volume of the impoundments, the supernatant is considered removed.

Land Disposal Restrictions - Continued  
(Part 268)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
<b>Land Disposal Facilities:</b>			
Does the facility have copies of all notices, certifications, and applicable demonstrations? 268.7(c)(1) (See also 265.73, Operating Record)	—	—	N/A
Has the facility tested the waste, or an extract of the waste or treatment residue (using the TCLP, 268 Appendix I) to assure that the wastes or residues are in compliance with land disposal restrictions? 268.7(c)(2)	—	—	↓
Was the testing performed according to the frequency specified in the waste analysis plan? 268.7(c)(2)	—	—	
Where First Third "soft hammer" (268.33(f)) or CA waste liquid (268.32) wastes are disposed, did the facility: 268.7(c)(3), 268.8(d)	—	—	
Ensure the required certification (268.8) was received prior to disposal? and:	—	—	
That the disposal unit was in compliance with the "minimum technology" requirements of 40 CFR 268.5(h)(2)?	—	—	

Identified TSFs that treat LDR Waste:

AZD049318009 Buds Oil Service  
 AZD980816102 Environmental Waste Entpr  
 AZT050010230 Esco  
 AZD089308803 Safety Kleen  
 AZD980892897 Safety Kleen  
 AZD009015389 Southwest Solvents  
 AZD049314370 Rinchem Co Inc  
 CAT080010101 Appropriate Technologies  
 CAD074644659 Baron Blakeslee  
 CAT000618652 Baron-Blakeslee  
 CAT080014079 Bay Area Environmental  
 CAD028409019 Crosby & Overton  
 CAD000633115 IT Corp, San Jose Transfer  
 CAD008302903 Oil & Solvent Processing  
 CAD042245001 Omega Chemical  
 CAD029363876 Orange County Chemical Co  
 CAT080012651 Orange County Chemical Co  
 CAD095894556 Pacific Treatment Company  
 CAD008364432 Rho-Chem  
 CAD980737548 Roehl Corp  
 CAD009452657 Romic Chemical  
 CAD066113465 Safety Kleen  
 CAD077187888 Safety Kleen  
 CAD093459485 Safety Kleen  
 CAD980894562 Safety Kleen  
 CAT000613935 Safety Kleen  
 CAT000613919 Safety Kleen  
 CAD066177783 Safety Kleen  
 CAT000613893 Safety Kleen  
 CAT000613976 Safety Kleen  
 CAT000613992 Safety Kleen  
 CAT000613950 Safety Kleen  
 CAT000613927 Safety Kleen  
 CAD080916968 Safety Kleen  
 CAD980892475 Safety Kleen  
 CAT000613984 Safety Kleen  
 CAD053044053 Safety Kleen  
 CAD980817159 Safety Kleen  
 CAT000613943 Safety Kleen  
 CAT000613968 Safety Kleen  
 CAD059494310 Solvent Services  
 CAT080033681 Chem Tech Inc. (formerly Triple J Pacification)  
 NVD980895338 Eticam

ID#                      Name/Address

Accepted w/o  
Certification?

In determining the concentration of HOCs in a hazardous waste for purposes of the § 268.32 land disposal prohibition, EPA has defined the HOCs that must be included in the calculation as any compounds having a carbon-halogen bond which are listed in this Appendix (see § 268.2). Appendix III to Part 268 consists of the following compounds:

#### *Volatiles*

Bromodichloromethane  
Bromomethane  
Carbon Tetrachloride  
Chlorobenzene  
2-Chloro-1,3-butadiene  
Chlorodibromomethane  
Chloroethane  
2-Chloroethyl vinyl ether  
Chloroform  
Chloromethane  
3-Chloropropene  
1,2-Dibromo-3-chloropropane  
1,2-Dibromomethane  
Dibromomethane  
Trans-1,4-Dichloro-2-butene  
Dichlorodifluoromethane  
1,1-Dichloroethane  
1,2-Dichloroethane  
1,1-Dichloroethylene  
Trans-1,2-Dichloroethene  
1,2-Dichloropropane  
Trans-1,3-Dichloropropene  
cis-1,3-Dichloropropene  
Iodomethane  
Methylene chloride  
1,1,1,2-Tetrachloroethane  
1,1,2,2-Tetrachloroethane  
Tetrachloroethene  
Tribromomethane  
1,1,1-Trichloroethane  
1,1,2-Trichloroethane  
Trichloroethene  
Trichloromonofluoromethane  
1,2,3-Trichloropropane  
Vinyl chloride

#### *Semivolatiles*

Bis(2-chloroethoxy)ethane  
Bis(2-chloroethyl)ether  
Bis(2-chloroisopropyl) ether  
p-Chloroaniline  
Chlorobenzilate  
p-Chloro-m-cresol  
2-Chloronaphthalene  
2-Chlorophenol  
3-Chloropropionitrile  
m-Dichlorobenzene  
o-Dichlorobenzene  
p-Dichlorobenzene  
3,3'-Dichlorobenzidine  
2,4-Dichlorophenol  
2,6-Dichlorophenol  
Hexachlorobenzene  
Hexachlorobutadiene  
Hexachlorocyclopentadiene  
Hexachloroethane  
Hexachloropropene  
Hexachloropropene  
4,4'-Methylenebis(2-chloroaniline)  
Pentachlorobenzene

Pentachloroethane  
Pentachloronitrobenzene  
Pentachlorophenol  
Pronamide  
1,2,4,5-Tetrachlorobenzene  
2,3,4,6-Tetrachlorophenol  
1,2,4-Trichlorobenzene  
2,4,5-Trichlorophenol  
2,4,6-Trichlorophenol  
Tris(2,3-dibromopropyl)phosphate

#### *Organochlorine Pesticides*

Aldrin  
alpha-BHC  
beta-BHC  
delta-BHC  
gamma-BHC  
Chlordane  
DDD  
DDE  
DDT  
Dieldrin  
Endosulfan I  
Endosulfan II  
Endrin  
Endrin aldehyde  
Heptachlor  
Heptachlor epoxide  
Isodrin  
Kepone  
Methoxychlor  
Toxaphene

#### *Phenoxyacetic Acid Herbicides*

2,4-Dichlorophenoxyacetic acid  
Silvex  
2,4,5-T

#### *PCBs*

Aroclor 1016  
Aroclor 1221  
Aroclor 1232  
Aroclor 1242  
Aroclor 1248  
Aroclor 1254  
Aroclor 1260  
PCBs not otherwise specified

#### *Dioxins and Furans*

Hexachlorodibenzo-p-dioxins  
Hexachlorodibenzofuran  
Pentachlorodibenzo-p-dioxins  
Pentachlorodibenzofuran  
Tetrachlorodibenzo-p-dioxins  
Tetrachlorodibenzofuran  
2,3,7,8-Tetrachlorodibenzo-p-dioxin

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DEPARTMENT OF HEALTH SERVICES  
TOXIC SUBSTANCES CONTROL DIVISION  
2151 BERKELEY WAY, ANNEX 7  
BERKELEY, CA 94704



May 23, 1988

CERTIFIED MAIL

Mr. Ray Mattman  
C&M Plating Works  
598 Sixth Street  
San Francisco, CA 94103

EPA ID No.: CAD009204736

Dear Mr. Mattman:

REPORT OF VIOLATION

On March 24, 1988, the Department of Health Services (Department) conducted an inspection of C & M Plating Works in San Francisco, California. As a result of that inspection, violations of hazardous waste statutes and regulations were found.

I. VIOLATIONS:

1. Sections 66481 (b), 66484 (a)(1), Title 22, California Code of Regulations (CCR).

Manifests were not fully completed by the generator. Specifically, manifests numbered 84451447 and 87032809 lacked the State Generator's ID number.

2. Section 67141 (e), Title 22, CCR.

The Contingency Plan lacked a list of all emergency equipment, including the locations, descriptions and capabilities of each item. The list did exist elsewhere, but it was not incorporated into the Contingency Plan, which must be sent to local emergency response agencies.

3. Section 67105 (d), Title 22, CCR.

The owner/operator has not maintained the following documents and records at the facility: The job title and name of the employee(s) for each position related to hazardous waste management; A written description of each position; A written description of the type and amount of both introductory and continuing training that will be given to each person handling hazardous

waste; Records that document that the training or job experience requirements have been met. These documents did exist for a former employee, but they did not exist for Ray Mattman, Partner.

4. Section 67122, Title 22, CCR.

The facility's eyewash, inside the building where the pretreatment units are located, was not working properly, due to low water pressure.

5. Section 66508 (a)(2)(3), (c), Title 22, CCR.

A 55 gallon drum, located near the filter press machine and partially filled with hazardous waste, did not have a hazardous waste label affixed.

6. Section 25201, Health and Safety Code; Section 66371 (a), Title 22, CCR.

C & M Plating has performed treatment of hazardous waste without a permit. Specifically, C & M Plating has performed cyanide destruction, chrome reduction, pH adjustment, chrome containing spent acid treatment, and filter press solidification without a permit for treatment from the California Department of Health Services.

7. Section 67212(d), Title 22, CCR.

The owner or operator failed to notify the Department at least 180 days prior to the date that closure was expected to begin for the 5 hazardous waste storage tanks located in the bulk waste storage area.

Upon receipt of this letter C & M Plating Works must correct all deficiencies noted in this Report of Violation and submit to the Department written documentation and photographs demonstrating that all violations have been corrected.

The Department may schedule a reinspection of C & M Plating Works to verify compliance.

Mr. Ray Mattman  
C & M Plating Works  
Page 3

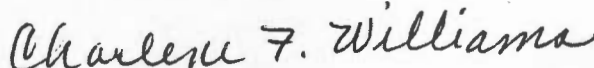
The issuance of this Report of Violation does not preclude the Department from taking administrative, civil, or criminal action as a result of the violations noted herein.

If you have any questions regarding this Report, please contact Bill Brown at (415) 540-2043.

Sincerely,



William L. Brown  
Hazardous Materials Specialist  
North Coast California Section  
Toxic Substances Control Division



Charlene F. Williams  
Senior Hazardous  
Materials Specialist  
North Coast California Section  
Toxic Substances Control Division

Cert. Mail No.: P 663 458 048

Enclosures

cc: Mary Locke, DHS, OE  
Paul Blais, DHS, S&E  
Karen Schwinn, U.S. EPA

CFW:wb:rvh

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## DEPARTMENT OF HEALTH SERVICES

2151 BERKELEY WAY  
BERKELEY, CA 94704

CAD 009 204 736

May 6, 1986

Ray Mattman  
C & M Plating Works  
598 Sixth Street  
San Francisco, California 94103

RE: EPA ID# CAD009204736

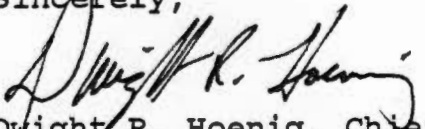
Dear Mr. Mattman:

An inspection of your facility was conducted on April 1, 1986 by Paul Kewin of this office. We are pleased to note our inspection revealed no deficiencies of your Hazardous Waste Facility Permit.

Your waste treatment systems, however, require a variance, as Mr. Kewin informed you during the inspection. Please submit the variance request form you were provided with as soon as possible.

We look forward to a continued cooperation between the Department of Health Services and C & M Plating Works in the future. If you have any further questions, feel free to contact Paul Kewin of this office, at (415)540-2043.

Sincerely,

  
Dwight R. Hoenig, Chief  
North Coast California Section  
Toxic Substances Control Division

cc: Paul Blais - U.S. EPA  
Paul Schwabacher - San Francisco Environmental Health

DRH:psk:ron

## DEPARTMENT OF HEALTH SERVICES

714/744 P STREET  
SACRAMENTO, CA 95814



Facility: C & M Plating Works  
598 Sixth Street  
San Francisco, CA 94103

HAZARDOUS WASTE FACILITY PERMIT

Number: CAD 009204736

Effective Date:

Operator: C & M Plating Works

Expiration Date:

Pursuant to Section 25200 of the California Health and Safety Code, this Hazardous Waste Facility Permit is hereby granted to C & M Plating Works subject to the conditions set forth in Attachment A which by this reference is incorporated herein.

Richard Wilcoxon, Chief  
Toxic Substances Control Division

Date \_\_\_\_\_

## ATTACHMENT A

### Hazardous Waste Facility Permit

C & M Plating Works  
598 Sixth Street  
San Francisco, CA 94103

#### I. DESCRIPTION OF FACILITY

##### 1. Ownership, Operations, and Location

C & M Plating Works hereinafter called the "Operator" and/or "Owner" has applied to the California State Department of Health Services for a permit authorizing the operation of a hazardous waste facility located at 598 Sixth Street, San Francisco, San Francisco County. The facility involves the storage of plating shop wastes (cyanide sludge, acids, and oxidizers) in tanks and containers. Storage capacity at the facility is seven 55-gallon drums, one 470-gallon tank and four 1,300-gallon tanks. Accordingly, the California State Department of Health Services has jurisdiction to issue a permit authorizing the operation of the hazardous waste storage facility subject to the following terms and conditions.

##### 2. Compliance with California Environmental Quality Act

The facility involves the continued operation of an existing facility with only minor alterations, and is therefore exempt from the California Environmental Quality Act pursuant to Section 15101, Title 14, California Administrative Code.

#### II. GENERAL CONDITIONS

##### 1. References and Terminology

All parts in this permit are identified by Roman numerals. The items set forth in each part shall apply to the owner, operators, and/or facility in addition to the items set forth in any preceding and/or following part of this permit. Unless explicitly stated otherwise, all cross-reference to items in this permit shall refer only to items occurring within the same part.

##### 2. Effect of Permit

The owner or operator is permitted to treat, store, and transfer hazardous wastes in accordance with the conditions of this permit. Any treatment, storage, and/or transfer of hazardous wastes not authorized in this permit is prohibited. Compliance with this permit constitutes compliance, for purposes of enforcement, with the provisions of the California Health and Safety Code, including Chapter 6.5,

Division 20, and with the minimum Standards for Management of Hazardous and Extremely Hazardous Wastes (Chapter 30, Division 4, Title 22, California Administrative Code). Issuance of this permit does not convey property rights of any sort or any exclusive privilege, nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of federal, state, or local law or regulations. Compliance with the terms of this permit does not constitute a defense to any action brought under any other law governing protection of public health or the environment for any imminent and substantial endangerment to human health or the environment. Interim Status Document Number CAD 09204736 (issued March 30, 1981) is not valid beyond the date of this permit.

3. Permit Actions

This permit may be modified, revoked and reissued, or terminated for cause as specified in Sections 122.15, 122.16, and 122.17, Title 40, Code of Federal Regulations (CFR), or at the discretion of the California State Department of Health Services in order to protect public health or the environment. A new facility permit condition or a modification of an existing facility permit condition shall become effective on the date that written notice of such change is received by the owner or operator. The filing of a request for a permit modification, revocation and reissuance, or termination or the modification of planned changes or anticipated noncompliance on any part of the owner or operator does not stay the applicability or enforceability of any permit condition.

4. Need to Halt or Reduce Activity

It shall not be a defense for the owner or operator in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

5. Severability

The provisions of this permit are severable, and if any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.

6. Operation Plan

The owner or operator shall operate and maintain the facility in accordance with the operation plan and operation plan



additions submitted to the California State Department of Health Services on May 16, 1983 and June 29, 1983, respectively. By the issuance of this permit, this operation plan is hereby approved. The plan shall be maintained at the facility at all times until closure is completed. This operation plan, the operation plan additions and any subsequent revisions thereof, which have been approved by the California State Department of Health Services, are by this reference made part of this permit. Specific sections of the operation plan are referenced elsewhere in this permit.

In the event of any conflict between the referenced operation plan and this permit, the conditions of this permit shall be controlling.

7. General Responsibilities of Operator

(a) Compliance

The owner or operator shall comply with all conditions of this permit, except to the extent and for the duration such noncompliance is authorized by an emergency permit. Any permit noncompliance constitutes grounds for enforcement action, permit termination, revocation and reissuance, modification, or for denial of a permit renewal application.

(b) Reapplication

If the owner or operator wishes to continue an activity regulated by this permit after the expiration date of this permit, the owner or operator must submit a completed application for a new permit at least 180 days before this permit expires.

(c) Permit Expiration

This permit and all conditions therein will remain in effect beyond the permit expiration or termination date if the owner or operator has submitted a timely, completed application and, through no fault of the owner or operator, the California State Department of Health Services has not issued a new permit.

(d) Mitigation

The owner or operator shall take all reasonable steps to minimize or correct any adverse impact on the environment resulting from noncompliance with this permit.

(e) Operation and Maintenance

The owner or operator shall at all times properly operate and maintain all facilities of treatment and control (and related appurtenances) which are installed or used by the owner or operator to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facility or similar systems only when necessary to achieve compliance with the conditions of the permit.

(f) Submittal of Requested Information

The owner or operator shall furnish to the California State Department of Health Services, within a reasonable time, any relevant information which the California State Department of Health Services may request to determine whether cause exists for modifying, revoking and reissuing, terminating this permit, or to determine compliance with this permit. The owner or operator shall also furnish to the California State Department of Health Services, upon request, copies of records required to be kept by this permit.

(g) Inspection and Entry

The owner or operator shall allow authorized representatives of the California State Department of Health Services or the local health agency, upon the presentation of credentials and other documents as may be required by law to:

- (1) Enter at reasonable times upon the owner's or operator's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;
- (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (3) Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and

- (4) Sample or monitor, at reasonable times, for the purposes of assuring permit compliance or, as otherwise authorized by law, any substances or parameters at any location.

(h) Monitoring and Records

- (1) Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The method used to obtain a representative sample of the waste to be analyzed must be the appropriate method from Appendix 1 of 40 CFR Part 261. Laboratory methods must be those specified in the approved operation plan.
- (2) The owner or operator shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports and records required by this permit, and records of all data used to complete the application for this permit for a period of at least three years from the date of the sample, measurement, report, or records. These periods may be extended by request of the California State Department of Health Services at any time and are automatically extended during the course of any unresolved enforcement action regarding this facility.
- (3) Records of monitoring information shall include:
- (i) The date, exact place, and time of sampling or measurements;
  - (ii) The individual(s) who performed the sampling or measurements;
  - (iii) The date(s) analyses were performed;
  - (iv) The individual(s) who performed the analyses;
  - (v) The analytical techniques or methods used; and
  - (vi) The results of such analyses.

(i) Planned Changes

The owner or operator shall give notice to the California State Department of Health Services of any

planned physical alterations or additions to the permitted facility.

(j) Anticipated Noncompliance

The owner or operator shall give advance notice to the California State Department of Health Services of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements.

(k) 24-Hour Reporting

The owner or operator shall report to the California State Department of Health Services any noncompliance which may endanger health or the environment. Any information shall be provided within 24 hours from the time the owner or operator becomes aware of the noncompliance. The following shall be included as information which must be reported within 24 hours.

- (1) Information concerning release of any hazardous waste that may cause an endangerment to public drinking water supplies.
- (2) Any information of a release or discharge of hazardous waste, or of a fire or explosion from the facility, which could threaten the environment or human health outside the facility. The description of the occurrence and its cause shall include:
  - (i) Name, address, and telephone number of the owner or operator;
  - (ii) Name, address, and telephone number of facility;
  - (iii) Date, time, and type of incident;
  - (iv) Name and quantity of material(s) involved;
  - (v) The extent of injuries, if any;
  - (vi) Assessment of actual or potential hazard to the environment and human health outside the facility, where this is applicable; and
  - (vii) Estimated quantity and disposition of recovered material that resulted from the incident.

A written submission shall also be provided within five days of the time the owner or operator becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the periods of noncompliance (including exact dates and times), and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance.

The owner or operator need not comply with the 5-day written requirement if the California State Department of Health Services waives that requirement and the owner or operator submits a written report within 15 days of the time the owner or operator becomes aware of the circumstances.

(l) Other Noncompliance

The owner or operator shall report all other instances of noncompliance not otherwise required to be reported at the time monitoring or other reports are submitted. The reports shall contain the information listed in II.6 (k) above.

(m) Other Information

Where the owner or operator becomes aware that he failed to submit any relevant facts in the permit application or submitted incorrect information in a permit application or any report submitted to the California State Department of Health Services, the owner or operator shall promptly submit such facts or information.

8. Signatory Requirement

All reports or other information requested by the California State Department of Health Services shall be signed by the owner or operator or the corporation's principal executive officer or, at least, the level of vice president. The person signing the document shall make the following certification:

"I certify under penalty of perjury that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there

are significant penalties for submitting false information, including the possibility of fine and imprisonment."

9. Certification of Construction

The owner or operator may not commence treatment, storage, or transfer of hazardous wastes at the facility nor in a modified portion of that facility until:

- (a) The owner or operator has submitted to the California State Department of Health Services by certified mail or hand delivery a letter signed by the owner or operator and an appropriate engineer registered in California stating that the facility has been constructed in compliance with the permit; and
- (b) (1) The California State Department of Health Services has inspected the constructed facility and finds it is in compliance with the conditions of the permit; or
- (2) The California State Department of Health Services has either waived the inspection or has not within 15 days notified the owner or operator of its intent to inspect.

10. Transfer of Permit

This permit may be transferred to a new owner or operator only if it is modified or revoked and reissued pursuant to Section 122.15 (b) (2) or 122.17 (d), Title 40, CFR. The owner or operator shall notify the California State Department of Health Services of a proposed change in ownership of the facility at least 30 days prior to the date of the transfer. Furthermore, before transferring ownership or operation of this facility during its operating life, the owner or operator shall notify the new owner or operator in writing of the requirements of this permit and the permitting process. A copy of this notification shall be submitted to the California State Department of Health Services.

11. Compliance Schedules

Reports of compliance or noncompliance with, or any reports on, interim and final requirements contained in any compliance schedule established or approved by the California State Department of Health Services shall be submitted no later than 14 days following each scheduled date.

## 12. Records

- (a) The owner or operator shall maintain at his place of business and at the facility, until closure is completed and certified by an independent registered engineer in California so as to be available at all times to operating personnel, the following documents and amendments, revisions, and modifications to these documents:

- (1) Waste Analysis Plan
- (2) Contingency Plan
- (3) Closure Plan
- (4) Personnel Training Documents and Records
- (5) Cost Estimate for Facility Closure
- (6) Operating Record
- (7) Inspection Schedules

All amendments, revisions, and modifications to any plan or cost estimates required by this permit shall be subject to the approval of the California State Department of Health Services.

- (b) The owner or operator shall maintain a copy of this permit at his place of business and at the facility so as to be available at all times to operating personnel.

## III. SPECIAL CONDITIONS

### 1. Hazardous Waste List

The owner or operator shall maintain current, the list of hazardous wastes that can be accepted by the facility presented in the approved operation plan. Additions to the list must first be approved by the California State Department of Health Services.

### 2. Wastes Prohibited

Hazardous wastes described below shall not be handled at the facility:

- (a) Forbidden and Class A explosives as defined in Sections 173.51 and 173.53, Title 49, CFR.

(b) Ignitable wastes.

(c) Any hazardous waste not listed in the approved operation plan.

3. Maintenance and Operation of Facility

The facility shall be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or nonsudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

4. Transfer of Wastes

(a) Hazardous wastes shall not be permanently disposed of at the facility.

(b) All equipment, pipes, and lines used at the facility to handle, transfer, pump, or store hazardous wastes shall be maintained in a manner that prevents the leaking and spilling of hazardous wastes.

5. Operation at Night

When the facility is operated during hours of darkness, the owner or operator shall provide sufficient lighting to ensure safe, effective management of hazardous wastes.

6. Analysis of Waste

(a) Upon the effective date of this permit, the owner or operator shall follow the written waste analysis plan as described in the approved operation plan.

(b) Before the owner or operator treats or stores or disposes of a particular type of hazardous waste for the first time, he shall obtain a detailed chemical and physical analysis of a representative sample of the waste. At a minimum, this analysis shall contain all the information which must be known to treat or store the waste in accordance with the conditions of this permit.

(c) The analysis may include data developed for other purposes, and existing published or documented data on the hazardous waste or on waste generated from similar processes.

(d) The analysis shall be repeated, as necessary, to ensure that it is accurate and up-to-date. At a minimum, the



analysis must be repeated when the owner or operator is notified or has reason to believe that the process operation generating the hazardous waste has changed.

- (e) The owner or operator shall verify its the waste analysis as part of the quality assurance program. The quality assurance program will be in accordance with current U. S. Environmental Protection Agency practices (test methods for evaluating solid waste: physical/chemical methods SW-846 dated July 1982) or equivalent methods approved by the California State Department of Health Services; and at a minimum ensure that the owner/operator maintain proper functional instruments, uses approved sampling and analytical methods, assures the validity of sampling and analytical procedures, and performs correct calculations.

## 7. Security

- (a) The perimeter of the hazardous waste are of the facility shall be secured by a well-maintained fence capable of preventing the intrusion of livestock and of discouraging entry by unauthorized persons.
- (b) The owner or operator shall maintain the following to control entry at all times to the active portion of the facility:
  - (1) A 24-hour surveillance system which continuously monitors and controls entry; or
  - (2) An artificial and/or natural barrier which completely surrounds the active portion of the facility and which has a means to control entry, at all times, through the gates or other entrances to the active portion of the facility.
- (c) Signs indicating that the facility, or the hazardous waste area of the facility, contains hazardous waste shall be placed on the perimeter fence at the entrance and at locations where it is anticipated that hunters and other trespassers may enter the facility.

Wording of the signs shall be in English, "Caution -- Hazardous Waste Area -- Unauthorized Persons Keep Out", and Spanish, "Cuidado! Zona de Residuouos Peligrosos. Prohibidala Entrada a Personas No Autorizadas". Signs will be legible from a distance of 25 feet.

8. Inspections

- (a) The owner or operator shall inspect the facility for malfunctions and deterioration, operator errors, and discharges which may be causing -- may lead to -- the release of hazardous waste constituents to the environment or a threat to human health. The owner or operator shall conduct these inspections often enough to identify problems in time to correct them before they harm human health or the environment.
- (b) (1) The owner or operator shall follow the written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment (such as dikes and pumps) that are important to preventing, detecting, or responding to environmental or human health hazards as described in the approved operation plan.  
  
(2) He shall keep this schedule at the facility.
- (c) The owner or operator shall remedy any deterioration or malfunction of equipment or structures which the inspection reveals on the schedule as described in the approved operation plan and which shall ensure that the problem does not lead to an environmental or human health hazard. Where a hazard is imminent or has already occurred, remedial action shall be taken immediately.
- (d) The owner or operator shall record inspections in an inspection log or summary and shall keep these records for at least three years from the date of inspection.

9. Personnel Training

- (a) Facility personnel shall successfully complete the program of classroom instruction or on-the-job training as described in the approved operation plan.
- (b) This program shall be directed by a person trained in hazardous waste management procedures.
- (c) Facility personnel shall have successfully completed the program required in Item 10 (a) by the effective date of this permit or within six months after the date of their employment or assignment to a facility or to a new position at the facility whichever is later. Employees hired after the effective date of this permit shall not

work in unsupervised positions until they have completed the training requirements of Item 10 (a).

- (d) Facility personnel shall take part in an annual review of the initial training required in Item 10 (a).
- (e) The owner or operator shall maintain the following documents and records at the facility:
  - (1) The job title for each position at the facility related to hazardous waste management and the name of the employee filling each job;
  - (2) A written job description for each position listed under Item 10 (e) (1). This description may be consistent in its degree of specificity with descriptions for other similar positions in the same company location or bargaining unit but shall include the requisite skill, education, or other qualifications and duties of facility personnel assigned to each position;
  - (3) A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under Item 10 (e) (1); and
  - (4) Records that document that the training or job experience required under Item 10 (a), (b), (c), and (d) has been given to and completed by the facility personnel.
- (f) Training records on current personnel as required in Item 10 (e) (4) shall be kept until closure of the facility. Training records on former employees shall be kept for at least three years from the date the employee last worked at the facility. Personnel training records may accompany personnel transferred within the same company.

10. Management of Reactive or Incompatible Wastes

- (a) The owner or operator shall take precautions to prevent accidental reaction of reactive wastes. This waste shall be separated and protected from sources of reaction. While reactive waste is being handled, the owner or operator shall confine smoking and open flame to specially designated locations. "No Smoking" signs shall be conspicuously placed wherever there is a hazard from ignitable or reactive wastes.

- (b) The storage, of reactive waste, and the mixture or commingling of incompatible wastes, or incompatible wastes and materials shall be conducted so that it does not:
  - (1) Generate extreme heat or pressure, fire or explosion, or violent reaction;
  - (2) Produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health or the environment;
  - (3) Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions;
  - (4) Damage the structural integrity of the device or facility containing the waste; or
  - (5) Through other like means threaten human health or the environment.
- (c) When required to comply with Items 11 (a) and (b), Part III, of this permit, the owner or operator must document that compliance. This documentation may be based on references to published, scientific, or engineering literature, data from trail tests, waste analyses, or the results of the treatment of similar wastes by similar treatment processes and under similar operation conditions.
- (d) The following incompatible hazardous waste groups shall be adequately separated from each other during all handling and storage operations:
  - (1) Alkalies and cyanides;
  - (2) Acids;
  - (3) Strong oxidizers;
  - (4) Toxic wastes, pesticides, and flammable wastes.

11. Required Equipment

- (a) Upon the effective date of this permit, the owner or operator shall have available at the facility all required safety and emergency equipment as described in the approved operation plan.

(b) The facility water supply system shall be capable of providing water in adequate volume and pressure to maintain water hose streams.

(c) Owner or operator shall maintain access to communication or alarm system specified in the approved operation plan.

12. Testing and Maintenance of Equipment

All facility communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment shall be tested and maintained as necessary to ensure its proper operation in the time of emergency.

13. Required Aisle Space

The owner or operator shall maintain aisle space as needed to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment.

14. Arrangements with Local Authorities

(a) Upon the effective date of this permit, all emergency response arrangements made by the facility with local authorities as described in the approved operation plan shall have been effected.

(b) If local authorities refuse to enter into preparedness and prevention arrangements with the owner or operator, the owner or operator shall document this refusal in the operating record.

15. Contingency Plan

(a) Maintenance

Upon the effective date of this permit, the owner or operator shall follow the contingency plan described in the approved operation plan.

(b) Distribution

A copy of the contingency plan and all revisions to the plan shall be:

(1) Maintained at the facility; and

(2) Submitted to all local police departments, fire departments, hospitals, and state and local

emergency response teams that may be called upon to provide emergency services.

(c) Implementation

The provisions of the contingency plan shall be carried out immediately wherever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment.

(d) Amendment of Contingency Plan

The contingency plan shall be reviewed and immediately amended, if necessary, whenever:

- (1) Applicable regulations are revised;
- (2) The plan fails in an emergency;
- (3) Whenever the permit is revised;
- (4) The list of emergency coordinators changes; or
- (5) The list of emergency equipment changes; and
- (6) The owner or operator shall submit to the California State Department of Health Services within 30 days any proposed amendments to the contingency plan.

(e) Emergency Coordinator

At all times there shall be at least one employee either on the facility premises or on call (i.e., available to respond to an emergency by reaching the facility within a short period of time) with the responsibility for coordinating all emergency response measures. This emergency coordinator shall be thoroughly familiar with all aspects of the facility's contingency plan, all operations and activities at the facility, the location and characteristics of waste handled, the location of all records within the facility, and the facility layout. In addition, this person shall have the authority to commit the resources needed to carry out the contingency plan.

(f) Emergency Procedures

- (1) Whenever there is an imminent or actual emergency situation, the emergency coordinator (or his

designee when the emergency coordinator is on call) shall follow the procedures of the contingency plan as described in the approved operation plan.

- (2) The owner or operator shall notify the California State Department of Health Services and local authorities that the cleanup procedures are complete and all emergency equipment listed in the contingency plan is clean and fit for its intended use before operations are resumed.
- (3) The owner or operator shall note in the operating record the time, date, and details of any incident that requires implementing the contingency plan.
- (4) The owner or operator shall report each incident to the California State Department of Health Services in accordance with the 24-hour reporting requirement contained in 11.5 (k) of this permit.

16. Recordkeeping and Reporting

(a) Availability, Retention, and Disposition of Records

- (1) All records including plans, required in this permit shall be furnished upon request, and made available at all reasonable times for inspection, by any officer, employee, or representative of the California State Department of Health Services.
- (2) The retention period for all records required in this permit is extended automatically during the course of any unresolved enforcement action regarding the facility or as requested by the California State Department of Health Services.

(b) Operating Record

- (1) The owner or operator shall keep a written operating record at the facility.

The following information shall be recorded, as it becomes available, and maintained in the operating record until closure of the facility:

- (i) A description and the quantity of each hazardous waste received, and the method(s) and date(s) of its treatment or storage at the facility;

- (ii) The location of each hazardous waste within the facility and the quantity at each location. This information shall include cross-references to specific manifest document numbers, if the waste was accompanied by a manifest;
- (iii) Records and results of waste analyses and trial tests performed;
- (iv) Summary reports and details of all incidents that require implementing the contingency plan;
- (v) Records and results of inspections (except these data need be kept only three years);
- (vi) Required monitoring, testing, or analytical data; and
- (vii) All closure cost estimates.

(c) Annual Report

The owner or operator shall prepare and submit a single copy of an annual report to the California State Department of Health Services by March 1 of each year beginning March 1, 1984. The annual report shall cover facility activities during the previous calendar year and shall include the following information:

- (1) The EPA identification number, name, and address of the facility;
- (2) The calendar year covered by the report;
- (3) The EPA or California State Department of Health Services identification number of each hazardous waste generator from which the facility received a hazardous waste during the year; for imported shipments, the report shall give the name and address of the foreign generators; and
- (4) The description, quantity, and method of treatment, storage, and/or disposal of each hazardous waste the facility received during the year, listed by EPA or the California State Department of Health Services identification number of each generator.



(d) Additional Reports

In addition to submitting the annual report required in Item 16 (c), the owner or operator shall also report to the California State Department of Health Services:

- (1) Releases, fires, and explosions; and
- (2) Facility closure.

17. Closure

(a) Closure Plan and Amendment of Plan

- (1) The owner or operator shall comply with the closure plan as described in the approved operation plan.
- (2) The owner or operator may amend his closure plan at any time during the active life of the facility. (The active life of the facility is that period during which wastes are periodically received.) The owner or operator shall amend his plan any time changes in operating plans or facility design affect the closure plan.
- (3) The owner or operator shall submit to the California State Department of Health Services within 30 days, any proposed amendments made to the closure plan.
- (4) The owner or operator shall notify the California State Department of Health Services at least 180 days before the date he expects to begin closure.

(b) Time Allowed for Closure

- (1) Within 90 days after receiving the final volume of hazardous wastes, the owner or operator shall treat all hazardous wastes in storage or in treatment or remove them from the site in accordance with the approved closure plan.
- (2) The owner or operator shall complete closure activities in accordance with the approved closure plan and within six months after receiving the final volume of wastes.

(c) Disposal or Decontamination of Equipment

When closure is completed, all facility equipment and structures shall have been properly disposed of or

decontaminated by removing all hazardous waste and residues.

(d) Certification of Closure

When closure is completed, the owner or operator shall submit to the California State Department of Health Services certification both by the owner or operator and by an independent engineer registered in California that the facility has been closed in accordance with the specifications in the approved closure plan.

18. Financial Responsibility

(a) Cost Estimate for Facility Closure

- (1) The owner or operator shall have a written estimate of the cost of closing the facility in accordance with the applicable closure requirements of this permit. The owner or operator shall keep this estimate, and all subsequent estimates, at the facility. The estimate shall equal the cost of closure at the point in the facility's operating life when the extent and manner of its operation would make closure the most expensive as indicated by its closure plan.
- (2) The owner or operator shall prepare a new closure cost estimate whenever a change in the closure plan affects the cost of closure.
- (3) On each anniversary of the effective date of this permit, the owner or operator shall adjust the latest closure cost estimate using an inflation factor derived from the annual Implicit Price Deflator for Gross National Product as published by the U. S. Department of Commerce in its SURVEY OF CURRENT BUSINESS. The inflation factor shall be calculated by dividing the latest published annual Deflator by the Deflator for the previous year. The result is the inflation factor.

The adjusted closure cost estimate shall equal the latest closure cost estimate times the inflation factor.

- (4) The adjusted closure cost estimate shall be submitted to the California State Department of Health Services as part of the annual report required in III.16 (c).

(b) Financial Assurance for Facility Closure

The owner or operator shall demonstrate continuous compliance with 40 CFR 264.143 and .145 or where applicable with 40 CFR 264.146, .149, .150, and .151 by providing documentation of financial assurance in at least the amount of the cost estimates required by permit condition III.18 (a).

(c) An owner or operator who fulfills the requirements of III.18 (b) by obtaining a letter of credit, surety bond, or insurance policy will be deemed to be without the required financial assurance in the event of a bankruptcy, insolvency, or a suspension or revocation of the license or charter of the issuing institution. The owner or operator must establish other financial assurance within 60 days of such events.

(d) The owner or operator shall comply with all other financial responsibility and facility closure requirements of the California State Department of Health Services when enacted.

IV. STORAGE OF WASTES

1. General Conditions

(a) Hazardous waste shall not be stored at the facility for longer than one year without written approval from the California State Department of Health Services.

(b) If a hazardous waste is stored at the facility longer than one year, the owner or operator shall submit to the California State Board of Equalization fees due and payable in conformance with Chapters 1-8, Part 22, Division 2, Revenue and Taxation Code and with Article 8, Chapter 30, Division 4, Title 22, California Administrative Code.

2. Storage in Containers

(a) Conditions

(1) Containers used for storing hazardous waste shall be in a condition such that the containers can be safely transported, handled, or moved.

(2) If a container holding hazardous waste is not in good condition, or if it begins to leak, the owner or operator shall transfer the hazardous waste from this container to a container that is in good

condition or manage the waste in some other way that complies with the conditions of this permit.

(b) Compatibility of Waste

- (1) The owner or operator shall use a container made of or lined with materials which will not react with, and are otherwise compatible with, the hazardous waste to be stored, so that the ability of the container to contain the waste is not impaired.
- (2) Areas used for storing containers of hazardous waste shall be widely separated, or physical barriers shall be provided to ensure that commingling of incompatible hazardous wastes cannot occur if a container ruptures.

(c) Management

- (1) Containers holding hazardous wastes shall be stored only in the area designated in the approved operation plan.
- (2) A container holding hazardous waste shall remain closed during storage, except when it is necessary to add or remove waste.
- (3) A container holding hazardous waste shall not be opened, handled, or stored in a manner which might rupture the container or cause it to leak.
- (4) A label shall be maintained on all containers in which hazardous wastes are stored and records for the storage of all hazardous wastes shall be maintained pursuant to Section 66545, Title 22, of the California Administrative Code. Labels shall include the following information:
  - (i) Composition and physical state of the waste;
  - (ii) Special safety recommendations and precautions for handling the waste;
  - (iii) Statement or statements which call attention to the particular hazardous properties of the waste;
  - (iv) Amount of waste and name and address of the person producing the waste; and
  - (v) Date of acceptance at the storage facility.

(5) Empty containers contaminated with hazardous materials shall be stored, handled, and processed as hazardous wastes.

(6) The total number of containers storing hazardous waste in the storage area shall not exceed the designed capacity of that storage area at any one time.

(d) Inspections

The owner or operator shall inspect areas where containers are stored in accordance with the written inspection schedule of the approved operation plan.

(e) Containment

The owner or operator shall provide a spill containment system in accordance with the approved operation plan. Specifically, each hazardous waste storage area shall have a continuous base that is impervious to the waste stored and shall be designed and constructed so that any surface water runoff or spills can be contained, and surface water run-on can be excluded. The containment system shall have sufficient capacity to contain ten percent of the volume of containers or the volume of the largest container, whichever is greater.

(f) Incompatible Waste

(1) Incompatible wastes, or incompatible wastes and materials, shall not be placed in the same container, unless the requirements of Item 10 (b), Part III, of this permit are met.

(2) Hazardous waste shall not be placed in an unwashed container that previously held an incompatible waste or material unless the requirements of Item 10 (b), Part III, of this permit are met.

(3) A storage container holding a hazardous waste that is incompatible with any waste or material stored nearby in other containers, shall be separated from the other materials or protected from them by means of a berm.

### 3. Storage in Tanks

#### (a) Existing Tanks

- (1) The owner or operator shall maintain the minimum shell thickness specified in the approved operation plan at all times to ensure sufficient shell strength.
- (2) Prior to use, new, replacement, and repaired hazardous waste storage tanks and their appurtenances shall be certified by an engineer registered in California to be structurally sound and of adequate construction for the intended use.
- (3) Each hazardous waste storage tank and storage area shall be individually marked with the internationally recognized hazard identification system placards developed by the National Fire Prevention Association.
- (4) The total volume of hazardous waste stored in tanks shall not exceed the designed capacity at any one time.

#### (b) Operation

- (1) Storage of hazardous waste in tanks shall comply with Item 10 (b), Part III, of this permit.
- (2) Hazardous wastes shall not be placed in a tank if they could cause the tank or its inner liner to rupture, leak, corrode, or otherwise fail before the end of its intended life.
- (3) Undercovered tanks shall be operated to ensure sufficient freeboard to prevent overtopping.
- (4) Valves on hazardous waste storage tanks shall be kept locked when the facility is unattended.

#### (c) Analysis of Waste and Trial Tests

If a tank is to be used for storing a hazardous waste which is substantially different from waste previously stored in the tank, the owner or operator shall:

- (1) Conduct waste analyses and trial treatment or storage tests (e.g., bench scale or pilot plant scale tests) to document that this proposed

treatment or storage will comply with Items 3 (b) (1) and (2); or

- (2) Obtain written information on similar storage or treatment of similar waste under similar operating conditions to document that this proposed treatment or storage will comply with Items 3 (b) (1) and (2).

(d) Inspections

In accordance with the written inspection schedule in the approved operation plan, the owner or operator shall inspect:

- (1) Discharge control equipment, at least once each operating day, to ensure that it is in good working order;
- (2) Data gathered from monitoring equipment, at least once each operating day, to ensure that the tank is being operated according to its design;
- (3) The level of waste in the tank, at least once each operating day, to ensure compliance with Item 3 (b) (3);
- (4) The construction materials of the tank, at least weekly, to detect corrosion or leaking of fixtures or seams;
- (5) The shell thickness of all tanks to determine extent of corrosion. If excessive corrosion has occurred (readings indicate a difference of ten percent over readings taken before waste was first placed in the tank), the tank shall be emptied, cleaned, inspected, and corrective actions undertaken; and
- (6) The construction materials of, and the area immediately surrounding, discharge confinement structures, at least weekly, to detect obvious signs of leakage.

(e) Reactive Waste

- (1) Reactive waste shall not be placed in a tank, unless:
  - (a) The waste is treated, rendered, or mixed before or immediately after placement in the

tank so that the resulting waste, mixture, or dissolution of material is no longer reactive and Item 10 (b), Part III, of this permit is complied with; or

(b) The waste is stored in such a way that it is protected from any material or condition which may cause the waste to ignite or react; or

(c) The tank is used solely for emergencies.

(2) If the owner or operator stores reactive waste in covered tanks, he shall comply with the National Fire Protection Association's buffer zone requirements for tanks, contained in Tables 2-1 through 2-6 of the "Flammable and Combustible Code--1977".

(g) Incompatible Wastes

(1) Incompatible wastes, or incompatible wastes and materials, shall not be placed in the same tank, unless Item 10 (b), Part III, of this permit is complied with.

(2) Hazardous waste shall not be placed in an unwashed tank which previously held an incompatible waste or material.



STATEMENT OF FACTS

C & M PLATING WORKS  
598 SIXTH STREET  
SAN FRANCISCO, CA 94103

HAZARDOUS WASTE FACILITY PERMIT  
CAD 009204736

I. Description of Facility

C & M Plating Works is a facility which is involved with the storage of plating shop wastes (cyanides sludge, acids, and oxidizers) in tanks and containers before transferring the wastes to a Class I disposal site or hazardous waste treatment facility.

II. Types and Quantities of Wastes

The facility has two separate storage areas. One area is for containers holding either cyanides or oxidizers with a containment capacity of seven drums. The other area is for tanks (one 470-gallon and four 1300-gallon) containing either hydrochloric (HCl)(muriatic), sulfuric ( $H_2SO_4$ ), nitric ( $HNO_3$ ), chromic ( $CrO_3$ ) or hydrofluoric (HF) acid.

The facility is prohibited from handling or storing the following types of wastes:

- (a) Forbidden and Class A explosives as defined in Section 173.51 and 173.53, Title 49, CFR.
- (b) Any hazardous waste not listed in the approved operation plan.
- (c) Ignitable wastes.

III. Explanation of Draft Permit Conditions

The application, operation plan and additions to the operation plan have been reviewed and found to be complete.

All conditions and terms of the permit are required under Part 264, Title 40, Code of Federal Regulations and Division 20, California Health and Safety Code, Chapter 6.5 and Title 22, Chapter 30, California Administrative Code.

The General Conditions, Section II are standard conditions found in every permit and are based on federal and state laws and regulations.

Special Conditions, Section III, contain requirements which provide for:

- (a) Item 1 list of acceptable wastes
- (b) Item 2 list of prohibited wastes
- (c) Item 3,4,5 safe operations of the facility
- (d) Item 6 waste analysis plan

- (e) Item 7 security
- (f) Item 8 inspections
- (g) Item 9 personnel training plans
- (h) Item 10 management of ignitable, reactive or incompatible wastes
- (i) Item 11,12 equipment requirements
- (j) Item 13 required aisle space
- (l) Item 14,15 contingency plans
- (m) Item 16 recordkeeping and reporting
- (n) Item 17 closure plans
- (o) Item 18 financial responsibility

The Storage of Wastes, Section IV, provides specific conditions for the proper management of hazardous wastes stored in containers and tanks. Included are provisions for waste analysis, spill containment, inspections and closure.

#### IV. Public Participation

The application, operation plan and supplements, and draft permit will be available for public inspection at the Hazardous Waste Management Branch, Berkeley Regional Office, 2151 Berkeley Way, Berkeley, CA 94704 until September 23, 1983.

#### V. Contact Person:

John Papathakis  
Waste Management Engineer  
Department of Health Services  
Hazardous Waste Management Branch  
714/744 P Street  
Sacramento, CA 95814  
(916) 324-3755

## DEPARTMENT OF HEALTH SERVICES

2131 BERKELEY WAY  
BERKELEY, CA 94704  
(415) 540-2043

RECEIVED  
REGION I



November 3, 1983 NOV 7 10 3 AM '83

Ray Mattman  
C&M Plating Works  
598 Sixth St.  
San Francisco, CA 94103

Dear Mr. Mattman:

Enclosed please find a Final Hazardous Waste Facility Permit for your facility. The permit authorizes the storage and/or treatment of hazardous waste under certain specified conditions.

If you have any questions, please call Wil Bruhns at 540-2179.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Charles A. White'.

Charles A. White, P.E.  
Regional Administrator  
North Coast Region  
Hazardous Waste Management Branch

cc: Mr. William Wilson, EPA, Region IX, San Francisco

Paul Schwabacker, Acting Director  
Environmental Health Services - City of San Francisco



## DEPARTMENT OF HEALTH SERVICES

31 BERKELEY WAY  
BERKELEY, CA 94704

Dear Toxics Coordinator:

The California Department of Health Services, Hazardous Waste Management Branch has been authorized by the Federal Environmental Protection Agency to issue RCRA-equivalent permits to facilities that store and/or treat hazardous wastes in tanks and containers.

Please find enclosed the notices of a public hearing scheduled for September 7, 1983 to discuss the draft permits for the following hazardous waste facilities.

- |   |  |
|---|--|
| 1. IT Transportation Corp.<br>Northern California<br>4501 Pacheco Boulevard<br>Martinez, CA 94553<br>CA0000038917 | 4. United States Steel Corp.<br>Pittsburg Works<br>Loweridge Rd<br>Pittsburg, CA 94565<br>CA0009150194 |
| 2. IT Corporation<br>Amorco Facility<br>Marina Vista<br>Martinez, California 94553<br>CA0000819698                | 5. DeSoto, Inc.<br>1604 Fourth Street<br>Berkeley, CA 94710<br>CA0009110867                            |
| 3. Lawrence Berkeley Laboratory<br>1 Cyclotron Road<br>Berkeley, CA 94720<br>CA4890008986                         | 6. Pfizer, Inc.<br>4650 Shellmound St.<br>Emeryville, CA 94608<br>CA0009206178                         |
|   | *7. C&M Plating Works<br>598 Sixth Street<br>San Francisco, CA 94103<br>CA0009204736                   |

The Statement of Facts, which provides background information on a facility, and the draft permit for the facilities indicated by an asterisk have been included for your review.

Comments or recommendations on these draft permits will be accepted at the public hearing or in writing before September 23, 1983. Comments received after this date may not be given full consideration.

Please direct questions to the permit writer for a given facility at the hearing or submit written comments to the North Coast Region, Permits Unit, Hazardous Waste Management Branch, Department of Health Services, 2151 Berkeley Way, Berkeley, California 94704.

If you have any questions, please contact Wil Bruhns at (415) 540-2043.

Sincerely,

Charles A. White, P.E.  
Regional Administrator  
North Coast Regional Office  
Hazardous Waste Management Branch

STATE DEPARTMENT OF HEALTH SERVICES

LEGAL NOTICE AND NOTICE OF PUBLIC HEARING

**INTENT TO ISSUE A HAZARDOUS WASTE FACILITY PERMIT**

The Department of Health Services, Hazardous Waste Management Branch has drafted Hazardous Waste Facility Permits for the following facilities:

1. IT Transportation Corp.  
Northern California  
4501 Pacheco Boulevard  
Martinez, CA 94553
2. IT Corporation  
Amorco Facility  
Marina Vista  
Martinez, California 94553
3. Lawrence Berkeley Laboratory  
1 Cyclotron Road  
Berkeley, CA 94720
4. United States Steel Corp.  
Pittsburg Works  
Loveridge Road  
Pittsburg, CA 94565
5. De Soto, Inc.  
1604 Fourth Street  
Berkeley, CA 94710
6. Pfizer, Inc.  
4650 Shellmound Street  
Emeryville, CA 94608
7. C&M Plating Works  
598 Sixth Street  
San Francisco, CA 94103

The permits will authorize these facilities to store and/or treat hazardous wastes under specific conditions to assure safe operation of the facilities.

This notice hereby invites comments before final issuance of these permits. Anyone wishing to submit comments should do so by either: 1) submitting written comments within the next forty-five (45) days to the address listed below, or 2) submitting verbal comments during a public hearing, to be held:

Location: State Department of Health Services  
2151 Berkeley Way, Room 136  
Berkeley

Time : 9:00 a.m.

Date : September 7, 1983

All comments will be taken into consideration in preparing the final permit. All comments will be addressed in writing in the Administrative Record and will be available to the general public.

The draft permit and application form, operation plan, and supplements submitted as required are available for public review at the Berkeley Regional Office, Hazardous Waste Management Branch, 2151 Berkeley Way, Berkeley, CA 94704 between the hours of 8:00 a.m. and 5:00 p.m., Monday through Friday. The office phone number is (415) 540-2043. Written comments should also be sent to this address.

Contact person: Wil Bruhns, Permit Coordinator

## DEPARTMENT OF HEALTH SERVICES

101 BERKELEY WAY  
BERKELEY, CA 94704

CERTIFIED #P26 5025152



(415) 540-2043

April 6, 1983

Mr. Ray Mattman  
C&M Plating Works  
6th & Brannan  
San Francisco, CA 94103

CAD 009204736

Dear Mr. Mattman:

Your revised Plan of Correction dated January 17, 1983 is approved, subject to the requirements of our Permits Section as they work with you concerning the Operation Plan for your facility.

Please contact Dick Burgard of this office (415) 540-2063 if you have any further questions in this matter.

Sincerely,

Charles A. White, P.E.,  
Regional Administrator  
North Coast Region  
Hazardous Waste Management Branch

cc: ✓ Paul Blais,  
U.S. EPA  
Region IX  
San Francisco

Harold Singer,  
RWQCB  
Oakland

Jack Coyne, Director of Environmental Health  
San Francisco County

William Marlin,  
OLS, Sacto



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## DEPARTMENT OF HEALTH SERVICES

2151 BERKELEY WAY  
BERKELEY, CA 94704

415/540-2043

U.S.E.P.A.  
REGION 9  
COMM CNTR

SEP 8 11 52 AM '82

Certified No. P26 5026112

September 3, 1982

CADO09204736

Mr. Ray Mattman, Partner  
C & M Plating Works  
598 - 6th Street  
San Francisco, CA 94103

Dear Mr. Mattman:

On January 14, 1982, an inspection of your facility was conducted by Dick Burgard of this office.

The following violations were found during that inspection.

1. The hazardous waste storage area contained tanks of acid and drums of cyanide wastes. There was no berm to prevent comingling of wastes in the event leakage should occur. Both materials were stored within 25 ft. of each other on the same asphalt pad. Further, there was a drain in the pad which permitted leakage, including any cyanide leakage to automatically re-enter the building and flow into the acid neutralization tank. A containment wall to retain the entire contents of all tanks; a berm around the cyanide drum storage area and a permanent closure of the drain into the building are necessary before C & M Plating can be deemed to be in compliance with Section 66525(a), Article 6, Chapter 30, Division 4, Title 22 of the California Administrative Code (hereafter cited by Section as CAC) and Section II 2(a) of the Interim Status Document (hereafter cited by Section as ISD).
2. The operator did not have a waste analysis plan. A proper waste analysis plan is needed to conform with all Sections and subsections of Section III 3, ISD.
3. Records were not available to document on-the-job training as specified in Section III 6(a)(1) and III 6(a)(3) ISD. This is a violation of Section III 6(d) ISD.
4. The contingency plan did not describe arrangements to coordinate emergency services set out in the contingency plan. This is required for compliance with III 13(c) ISD.
5. Copies of the contingency plan have not been submitted to the local police department, fire department, hospitals, State and local emergency response teams and the California Department of Health Services. This is a violation of III 14(b) ISD.

6. An annual report for 1981 has not been submitted. This is a violation of Item IV, 3, ISD.

Please describe to this office the corrections that have been made and provide a written Plan of Correction describing the steps you will take and a proposed time schedule to rectify any deficiencies that have not been fully corrected.

Section 66328(d) C.A.C. states: "If corrections are needed, the operator shall provide to the Department a written plan of correction which states the actions to be taken and the expected dates of completion."

You are hereby directed to submit a Plan of Correction to this office, pursuant to Section 66328(d) C.A.C., which describes the steps you will take to correct these deficiencies. Your Plan of Correction must be received at this office within 30 days from the date of this letter.

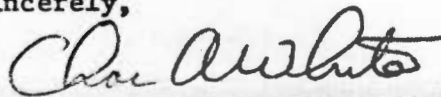
Your attention is directed to Sections 25188, 25189, and 25191 of the California Hazardous Waste Control Law, which provide for civil and criminal penalties of up to \$25,000 per day per violation for violations of the California Hazardous Waste Control Law and Regulations, Hazardous Waste Facility Permit, or Interim Status Document.

In addition, Section 66396(a) C.A.C. states: "The Director may modify, suspend or revoke a permit issued pursuant to this chapter for:

- 1) Violation of any requirement of this chapter...
- 4) Violation of a condition of the Hazardous Waste Facility Permit".

If you have any questions in this matter, please contact Dick Burgard of this office.

Sincerely,



Charles A. White, P.E.  
Regional Administrator  
Hazardous Waste Management Branch

cc: Harold Singer  
SFBRWQCB  
Oakland, CA 94707

Jack Coyne  
Director of Environmental Health  
San Francisco, CA 94102

Paul Blais  
U.S. EPA  
San Francisco, CA 94105